

1 Roger L. Grandgenett II, Esq.  
Nevada Bar No. 6323  
2 LITTLER MENDELSON P.C.  
3960 Howard Hughes Parkway  
3 Suite 300  
Las Vegas, Nevada 89169.5937  
4 Telephone: 702.862.8800  
Fax No.: 702.862.8811  
5 rgrandgenett@littler.com

6 *Attorneys for Defendant*  
7 FOUNDEVER OPERATING CORPORATION

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 JASHYUA THOMAS,

11 Plaintiff,

12 v.

13 FOUNDEVER OPERATING  
CORPORATION, a corporation, and DOES 1-  
14 50, inclusive,

15 Defendants.

Case No. 2:25-cv-00152-APG-BNW

**STIPULATION AND ORDER TO  
DISMISS ENTIRE ACTION WITH  
PREJUDICE**

16  
17 Plaintiff, JASHYUA THOMAS (“Plaintiff”), and Defendant, FOUNDEVER OPERATING  
18 CORPORATION (“Defendant”) (collectively herein the “Parties”), hereby stipulate and agree to  
19 the dismissal of this action in its entirety, including all claims and causes of action, with prejudice.

20 The Parties have reached an agreement to resolve this action. The Parties submit the instant  
21 Stipulation pursuant to their agreement for resolution. The Parties agree that no Party to this  
22 Stipulation shall be deemed to be a prevailing party in this action and that no Party will file for an  
23 award of attorneys’ fees or costs pursuant to any rule, statute, or law, whether local, state, or federal,  
24 in any forum that would be available for the claims dismissed by this Stipulation.

25  
26 ///

27  
28 ///

Each Party shall bear its own costs and fees for the claims dismissed by this Stipulation and Order.

Accordingly, the Parties respectfully request the Court grant the instant Stipulation, dismiss the action with prejudice and close the case.

Dated: May 28, 2025

Dated: May 28, 2025

BAIN MAZZA & DEBSKI LLP

LITTLER MENDELSON P.C.

/s/Kathryn L. Bain, Esq.  
Kathryn L. Bain, Esq.

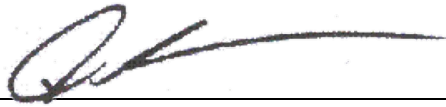
/s/ Roger L. Grandgenett, Esq.  
Roger L. Grandgenett II, Esq.

*Attorney for Plaintiff*  
JASHYUA THOMAS

*Attorneys for Defendant*  
FOUNDEVER OPERATING  
CORPORATION

**IT IS SO ORDERED**

Dated: May 29, 2025



\_\_\_\_\_  
CHIEF UNITED STATES DISTRICT JUDGE

4933-7548-1364.1 / 114832-1028